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7 *Attorneys for Debtors*
8 *and Reorganized Debtors*

9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

20 ** All papers shall be filed in the Lead*
21 *Case, No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**SCHEDULING STIPULATION WITH
RESPECT TO FULCRUM CREDIT
PARTNERS LLC'S MOTION FOR RELIEF
FROM PLAN INJUNCTION, TO COMPEL
ARBITRATION AND/OR FOR
ABSTENTION**

Related Docket No.: 11066

1 **WHEREAS**, on January 29, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and
2 Electric Company (the “**Utility**” and, together with PG&E Cop., the “**Debtors**” or “**Reorganized**
3 **Debtors**”, as applicable), commenced with the Court voluntary cases under chapter 11 of title 11 of
4 the United States Code (the “**Bankruptcy Code**”). The *Debtors’ and Shareholder Proponents’ Joint*
5 *Chapter 11 Plan of Reorganization dated June 19, 2020* [Docket No. 8048] (the “**Plan**”) was
6 confirmed by Order of the Court dated June 20, 2020 [Docket No. 8053]. The Plan became effective
7 on July 1, 2020.

8 **WHEREAS**, on August 17, 2021, Fulcrum Credit Partners LLC (“**Fulcrum**,” and together
9 with the Debtors and Reorganized Debtors, the “**Parties**”) filed the *Motion for Relief from Plan*
10 *Injunction, to Compel Arbitration and/or for Abstention* [Docket No. 11066] (the “**Motion**”), which
11 noticed a response deadline of August 31, 2021, and a hearing date of September 14, 2021 (the
12 “**Hearing Date**”).

13 **WHEREAS**, the Parties have conferred and agreed to a revised schedule for the Motion.

14 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, THROUGH THE**
15 **UNDERSIGNED, THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO**
ORDER, THAT:

16 1. The Hearing Date shall be continued to September 29, 2021, at 10:00 am (Prevailing
17 Pacific Time). The September 14, 2021 hearing on the Motion is taken off the Court’s calendar.

18 2. The Reorganized Debtors’ response to the Motion must be filed with the Court by
19 September 15, 2021.

20 3. Any reply by Fulcrum must be filed with the Court by September 22, 2021.

21 4. This Stipulation shall constitute the entire agreement and understanding of the
22 Parties relating to the subject matter hereof.

23 5. This Stipulation may be executed in counterparts, each of which shall be deemed an
24 original but all of which together shall constitute one and the same agreement.

25 6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
26 controversies arising from this Stipulation.

1 Dated: August 27, 2021

Dated: August 27, 2021

2 KELLER BENVENUTTI KIM LLP

ALSTON & BIRD, LLP

3 /s/ Jane Kim

/s/ Diane Stanfield

Jane Kim

Diane Stanfield

4 *Attorneys for the Debtors and Reorganized*
5 *Debtors*

Attorneys for Fulcrum Credit Partners, LLC